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The supreme court of appeals decided that the public health council had no power to remove the city health commissioner because of his failure and refusal to devote his entire time to official duties, and held that the power of removal was confined to the situation set forth in the statute and could only be exercised in cases of emergency affecting the public health as in the case of an epidemic within the limits of the local jurisdiction.

POWER OF CITY TO REGULATE GARBAGE DISPOSAL UPHELD.

The Supreme Court of Michigan in a recent case¹ has sustained the principle, recently enunciated by the Missouri Supreme Court in a case published in the Public Health Reports of May 28, 1920, that the property rights of individuals in garbage are subordinate to the general good and that garbage disposal is subject to control by municipalities under the police power.

The plaintiffs, proprietors of hotels and restaurants, conveyed to their farms outside the city and there fed to hogs and poultry the garbage from such hotels and restaurants. This was done in a cleanly manner, but was in violation of an ordinance of the city of Grand Rapids, and plaintiffs were notified by the city to discontinue such conveyance and disposal of their garbage.

The plaintiffs thereupon sought an injunction to restrain the city from interfering. The lower court granted an injunction, but on appeal the supreme court reversed the decree and enjoined plaintiffs from conveying the garbage through the streets and from violating the garbage ordinance in any manner.

In answer to the contention of plaintiffs that they had a right to dispose of garbage produced upon their own premises because it was property of value, and that as to them the ordinance was wanting in the due process of law required by the Constitution, the supreme court held that the city had the right to regulate the disposal of garbage and that the plaintiffs were compensated for any loss in the common benefit secured by the ordinance.

¹ *Pantlind et al. v. City of Grand Rapids*, 177 N. W., 302.

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